

EXHIBIT A



IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

NEXSTAR MEDIA INC.,)
)
Plaintiff,)
)
v.) C.A. No. N21C-08-086 AML CCLD
)
SPECTRUM MANAGEMENT)
HOLDING COMPANY, LLC,)
)
Defendant.)

**MOTION FOR LEAVE TO FILE
EXHIBIT TO COMPLAINT UNDER SEAL**

Plaintiff Nexstar Media Inc. (“Plaintiff”), by its undersigned counsel, respectfully seeks leave, pursuant to Superior Court Civil Rule 5(g), for the entry of an order in the form attached hereto authorizing the filing of Exhibit 1 to the Complaint (the “Exhibit,” enclosed herewith) under seal. The grounds for the motion are as follows:

1. Plaintiff filed its Complaint on August 11, 2021. Because of its confidential and sensitive nature, Plaintiff filed a slip-sheet in place of the Exhibit to its Complaint.
2. Superior Court Civil Rule 5(g) grants the Court authority to seal the Exhibit upon a showing of “good cause.” Sup. Ct. Civ. R. 5(g)(2).
3. Superior Court Civil Rule 5(g) further provides that “Court Records or portions thereof shall not be placed under seal unless and except to the extent that

the person seeking the sealing thereof shall have first obtained, for good cause shown, an order of this Court specifying those Court Records, categories of Court Records, or portions thereof which shall be place under seal” *Id.*

4. Exhibit 1, submitted herewith, is a retransmission consent agreement between the parties, which sets forth the rates and other terms that govern Defendant Spectrum Management Holding Company, LLC’s distribution to its subscribers of television stations owned or, in certain circumstances, serviced by Plaintiff. Plaintiff maintains the highest level of confidentiality for this information. The Exhibit is highly sensitive from a competitive standpoint, including because Plaintiff negotiates similar contracts with different parties. Public disclosure of the terms of Exhibit 1 could result in substantial competitive harm to Plaintiff.

5. Accordingly, Plaintiff seeks an order granting it permission to file the Exhibit to the Complaint on the docket under seal.

6. The relevant portions of the Exhibit are quoted in the Complaint. Accordingly, Plaintiff respectfully requests that the Court waive the public version requirement pursuant to Superior Court Civil Rule 5(g)(2).

WHEREFORE, Plaintiff respectfully requests that this Court enter an order in the form attached hereto authorizing Plaintiff to file the Exhibit to the Complaint under seal.

Of Counsel:

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Dated: August 13, 2021

/s/ Daniel J. McBride

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Attorneys for Plaintiff Nexstar Media Inc.

EXHIBIT B



IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

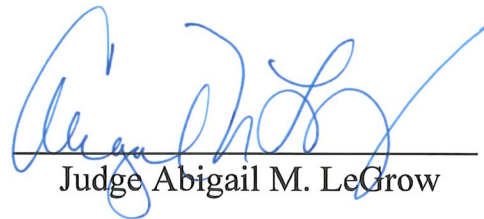
NEXSTAR MEDIA INC.,)
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Plaintiff,)
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v.) C.A. No. N21C-08-086 AML CCLD
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SPECTRUM MANAGEMENT)
HOLDING COMPANY, LLC,)
)
Defendant.)

**[PROPOSED] ORDER GRANTING MOTION FOR
LEAVE TO FILE EXHIBIT TO COMPLAINT UNDER SEAL**

Plaintiff Nexstar Media Inc. ("Plaintiff") having moved for an order permitting it to file Exhibit 1 to the Complaint (the "Exhibit") in the above-captioned action under seal,

IT IS ORDERED this 16th day of August, 2021, that:

1. Good cause having been shown, Plaintiff is hereby permitted to file Exhibit 1 to the Complaint under seal.
2. The public version requirement of Superior Court Civil Rule 5(g)(2) is hereby waived.


Judge Abigail M. LeGrow

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MCC PROHONOTARY